

December 13, 1999

Clifford Hawkes  
National Park Service  
12795 West Alameda Parkway  
Lakewood, CO 80228

RE: Winter Use Plan (DEIS) for the Yellowstone and Grand Teton National Parks  
and John D. Rockefeller, Jr., Memorial Parkway

Dear Mr. Hawkes:

Please accept the following comments on the Winter DEIS for Yellowstone (YNP) and Grand Teton (GTNP) National Parks and John D. Rockefeller, Jr., Memorial Parkway (JDRP). I strongly support *The Citizens' Solution for Winter Access to Yellowstone*.

The Draft Environmental Impact Statement for (YNP) and (GTNP) and (JDRP) examines seven Alternatives (A-G) for Winter Use. Of these Alternatives, the National Park Service (NPS) has selected Alternative B as the Preferred Alternative. In reviewing all the Alternatives, the NPS has made a valiant effort to please all parties concerned. However, it appears that by doing so, the NPS has failed to address the problems of winter visitation on the wildlife and natural resources in the Greater Yellowstone Area (GYA) that may have caused long lasting negative impact. Unfortunately the NPS's proposal to plow the road from West Yellowstone to Old Faithful will cause additional obstacles to wildlife and greater expense for taxpayers. The NPS proposal will transfer snowmobile pollution, noise, and congestion to other road segments while adding automobiles to the mix. The NPS preferred Alternative B fails to address visitor carrying capacity in winter, the impact on wildlife, and does little to protect the unique natural values of the GYA, one of, if not the only, remaining intact temperate ecosystems on earth.

My comments are based on the seven major issues as determined by the NPS from scoping, public comment and issues addressed in the DEIS. These issues are; visitor use and access, visitor experience, air quality, snowmobile sound, human health and safety, social and economic impacts, and natural resources.

#### Visitor Use and Access

I applaud the NPS in their Alternative B for utilizing public transportation for access to YNP from West Yellowstone to Old Faithful. However, plowing the road from West Yellowstone to Madison and Old Faithful is not the best method for winter access. The plowing of the road is an unnecessary expense for a Park Service who needs to use funds to fix the past problems caused by years of neglected infrastructure. Also, Alternative B

relocates the current overused access by snowmobiles to other areas of the Park particularly the South Entrance. This form of access by snowmobiles will have a greater impact than stated by the DEIS on GTNP and JDRP. It is imperative that a winter carrying capacity study be funded and completed before increased activity by motorized and non-motorized forms of transportation is considered in less traveled areas of the GYA. A winter carrying capacity must be established to protect wildlife and natural resources and is a mandate of the Park Service as established by ... "the NPS Organic Act (16 USC 1, 2-4) and the General Authorities Act (16 USC 1a-8), which directs the agency to protect park resources and provide for the enjoyment of those resources in a manner that leaves them unimpaired for future generations." Is individual motorized use leaving the park resources unimpaired? I do not believe it is, given the amount of air, water, and noise pollution caused by these vehicles.

I support public transportation for winter access and would support the use of scheduled snowcoaches for oversnow travel from West Yellowstone, Mammoth, and Flagg Ranch. The snowcoaches should be newer, cleaner burning and less noisy models than those allowed in the past. This will add to the enjoyment of visitors to the Park. Through the use of snowcoaches, visitors will have continued access to Yellowstone National Park in winter, by way of one vehicle, multi-person occupancy that allows for opportunities to view scenery and wildlife, opportunities to experience quiet and solitude, and the educational experience of winter in Yellowstone through information programs as part of the snowcoach tour.

I support limits to off-trail backcountry use by skiers and snowshoers where wildlife need additional protection. *The Citizens' Solution for Winter Access to Yellowstone* addresses these access issues.

#### Under Alternative B in GTNP:

- I support auto entry at Moose and Moran to access the Park. Since these routes are in close proximity to US Highway 89 north of Jackson, this form of access makes sense.
- I support discontinued use of the Inner Park Road for snowmobile use. This area includes the Potholes and Signal Mountain.
- I support the phase out of snowmobiles on Jackson Lake. However, this should happen immediately, as this is an inappropriate use for Jackson Lake. What about the use of snowplanes on Jackson Lake? Will this also be phased out?
- I do not support moving the Continental Divide Snowmobile Trail (CDST) on the section from Moran to Flagg Ranch. Previously the Park Service stated that providing a separate corridor for the CDST was an inappropriate use and would have impacts to natural resources. In fact, the CDST should be closed in GTNP and JDRP. The proposal to pave a relocated section of the CDST and treat it like a bicycle path in other seasons is inappropriate, as it would not tie into any other bicycle path and the majority of present bicycle use is in the southern portion of GTNP.
- I do not support an ungroomed motorized trail near Shadow Mountain north to Triangle X Ranch and out to Highway 89. Also, the ungroomed section of the Moose/Wilson Road from the JY Ranch to Granite Canyon Trailhead should be for non-motorized travel only. This viewpoint is in agreement with the Greater

Yellowstone Coordinating Committee's report recognizing the need for quality front country non-motorized experience for skiers, snowshoers, and dogsledders.

- I do not support allowing any new permanent structures such as warming huts at Jenny Lake, Signal Mountain and Two Ocean Lake. We do not support further development of winterized lodging accommodations and fuel services in GTNP.

### Visitor Experience

Visitor experience data provided in the DEIS is more heavily weighted toward the snowmobile enthusiast than other users. This is understandable given the present day use of the Parks. But, the DEIS was in response to a suit brought against the Park Service because of trail grooming in winter, and the fact that the majority of respondents to surveys you cited were users of the groomed trails, it appears that the survey results are not as appropriate in determining winter use as are air quality, noise, natural resources, and human health and safety. "YNP visitors reported gaps between importance of several characteristics of their visit and the degree of satisfaction with the experience for that characteristic." The characteristics showing the largest gap are tranquility, peace and quiet, and getting away from crowds.

The Preferred Alternative B advocates the plowing of the road from West Yellowstone to Old Faithful. The number one reason to visit Yellowstone as stated in Table 31 and Table 32 in Chapter III of the DEIS is to view scenery and observe scenic beauty. "Plowing the road from the West Entrance to Old Faithful would create berms of snow that would detract from scenery viewing opportunities." The snow berms would also create a tunnel effect possibly trapping wildlife on the road.

### Air Quality

YNP is a Class I quality air shed. Air quality is legally addressed in the GYA under the Clean Air Act, the Organic Act of 1916, and NPS Management Policy. As documented below, the excessive pollution of two-stroke engines is clearly prohibited under each of these laws or policies. The use of two-stroke engines in national parks, in the form of snowmobiles, is extremely questionable.

According to National Park Service Policy 4.17, NPS Policy seeks to perpetuate the best possible air quality in parks "because of its critical importance to visitor enjoyment, human health, scenic vistas, and the preservation of natural systems and cultural resources." NPS Management Policies further states, "[In] cases of doubt as to the impacts of existing or potential air pollution on park resources, the Park Service will err on the side of protecting air quality and related values for future generations." "These policies require managers to assume an aggressive role in promoting and pursuing measures to safeguard air quality and related values from the adverse impacts of air pollution." (NPS, 1999)

The NPS is mandated through both its own 1916 Organic Act (16 U.S.C. 1), the Clean Air Act (42 U.S.C. 7401 et seq) and Executive Order 12088, as amended, to protect air

quality in National Parks. This Executive Order requires the head of each executive agency to ensure that all necessary actions are taken for the prevention, control, and abatement of environmental pollution (at 1-101) to submit a plan for the control of environmental pollution to the OMB annually, and to "ensure that sufficient funds for compliance with applicable pollution control standards are requested in the agency budget." (Id at 1-501.)

Section 176 of the Clean Air Act states, "No department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve, any activity which does not conform to an [state] implementation plan... [T]he assurance of conformity to such a plan shall be an affirmative responsibility of the head of such department, agency or instrumentality." Specifically addressing the NPS, the Clean Air Act states "the NPS, as a federal land manager, has an affirmative responsibility to protect air quality related values, including visibility, from the adverse effects of air pollution in areas that are designated as Class I." There are 48 Class I areas that are part of the NPS. Congress intended that these areas be afforded the greatest degree of air quality protection and specified that only very small amounts of air quality deterioration from new or modified major stationary sources is permitted. One of the purposes of this "prevention of Significant Deterioration (PSD)" program is "to preserve, protect, and enhance the air quality in national parks." (42 U.S.C. 7401 et seq.) Additionally, any action taken by the NPS, a Federal entity, must conform to state plans to achieve and maintain national air quality standards.

Clearly, federal actions must not cause or contribute to new violations, increase the frequency or severity of existing violations, interfere with timely attainment of maintenance of any standard, delay emission reduction milestones, or contradict State Implementation Plan requirements.

Currently, there are no federal laws regulating snowmobile exhaust. The typical snowmobile uses a two-stroke engine that produces high emissions of carbon monoxide (CO), unburned hydrocarbons (UHC), particulate material and a variety of gases classified as "air toxics" such as formaldehyde, and VOCs such as benzene. Snowmobiles don't use any pollution control equipment. The emissions are significantly higher than present-day automobiles and can concentrate in areas having cold and stable air.

Exposure to air pollutants, such as those listed above, is associated with numerous effects on human health. Those effects range from impairment of visual perception, manual dexterity, learning ability, and performance of complex tasks to headaches, fatigue, respiratory failure, and even death. Health concerns that are most commonly raised within the Park are related to smoke and vehicle emissions. Over 1200 letters of complaint were received by YNP in 1993 and 1994 relating to issues of employee and visitor health and excessive snowmobile pollution.

Snowmobiles are exponentially more polluting than automobiles for several reasons:

1) Every stroke of the piston in a two-stroke engine is a power stroke. Within a fraction of a second, the exhaust is vented and new gas, oil and air are brought in. Because both the exhaust and intake port are open at the same time, 25-30% of the raw fuel and oil is wasted and enters the environment with the exhaust.

2) Snowmobiles dump unburned fuel into YNP, GTNP and JDRP snowpacks every winter. In YNP, snowmobiles dump more than 50,000 gallons of unburned fuel into the snowpack. This is the equivalent of 5 tanker trucks of fuel spilling their loads in the park each winter. (Sources: Montana Department of Environmental Quality, 220,000 gallons of fuel were sold for snowmobile use within the park in the winter of 1995; Environmental Protection Agency, two stroke engines emit 25-30% of fuel unburned out the tailpipe in exhaust.)

3) Snowmobiles impair the Parks' air quality. One snowmobile emits 225 times more carbon monoxide than an automobile. One snowmobile emits 1000 times more hydrocarbons than an automobile. (Sources: National Park Service, snowmobile numbers and duration of visit from West Yellowstone to Old Faithful; International Snowmobile Industry Association, emissions levels and horsepower; Environmental Protection Agency, load factor, automobile emissions levels) Recent US Environmental Protection Agency (EPA) data shows that new automobiles emit over 3,000 times fewer hydrocarbons and nearly 600 times less carbon monoxide than modern snowmobiles.

4) Snowmobiles damage visitor and employee health. The highest carbon monoxide levels in the nation were recorded at Yellowstone's West Entrance during winters in the 1990s. The Park Service must pump fresh air into entrance booths to curb employee headaches, dizziness, throat irritation and nausea. (Source: Montana Department of Environmental Quality; Environmental Protection Agency; National Park Service)

By allowing snowmobiles to continue use in the GYA under the Preferred Alternative B, the Park service puts at risk our Class I air shed. Mike Finley, YNP Superintendent, states in an article in the Jackson Hole News dated October 27, 1999, "Yellowstone's air must be kept clean." He goes on to say that, "We are a class one area, like wilderness. Snowmobiles are not allowed in wilderness." He goes on to state in an opinion article he wrote for the Jackson Hole Guide on November 10, 1999 on why the information on the Air Resources Division of the National Park Services report is important, "The first reason involves human health. These new studies give us reason to wonder if park visitors' health may be affected by high levels of emissions during their trip into Yellowstone, not to mention the quality of experience from the visual effects and noise." He wrote, "These studies indicate that we are not meeting the intent of these laws." The laws in question are the 1916 Organic Act (16 U.S.C. 1), the Clean Air Act (42 U.S.C. 7401 et seq) and Executive Order 12088.

From a Sunday, November 14, 1999 editorial in the San Francisco Chronicle, "A weekend of snowmobiling creates more air pollution in the park than a year of automobile traffic. Some days at the west entrance, where snowmobilers congregate, the air is so befouled with exhaust that oxygen is pumped into the ranger booth to protect the

health of park employees." In the DEIS it states, "... YNP and GTNP began to study snowmobile emissions and found that CO and particulate matter (PM) concentrations were high enough to cause health and air quality concerns." In some cases, 2-minute average CO concentrations were measured in ranges of 0.1 ppm to 110.0 ppm. The high concentrations have been shown to impair psychomotor functions. Park employees are being subjected to high concentration of CO and PM. Even snowmobilers riding in groups may also suffer effects of the emissions from snowmobiles. This is a definite health hazard as well as a polluting of our National Park. Not only is air quality being compromised, water quality is also in danger from discharge from two-stroke snowmobile engine. This was cited in a 1974 report by Adams and another 1974 report by Ferrin and Coltharp. Has the Park Service been negligent in protecting the GYA? Also, if pollutants affect humans, the Park Service must address the affect on wildlife.

Because of (1) increased snowmobile use, (2) the amount of harmful pollutants, and (3) because snowmobiles are unregulated, the Park Service must mitigate or eliminate impacts to air quality. Currently there exists no means to mitigate these effects. Fortunately, the means to eliminate them does exist. Snowcoaches currently used in the GYA use four-stroke engines providing oversnow access. This mode of access must replace that of 2-stroke motorized access. Converting winter recreational transportation in YNP and GTNP and the JDRP would accomplish the desired conditions the park service seeks in this planning process, those being air quality, noise reduction and reduction in vehicle numbers.

Current air quality degradations within the parks warrant strong action, which is not adequately reflected, in the preferred alternative B. There is no defensible rationale for not preferentially utilizing available four-stroke technology in national parks, and eliminating extremely polluting two-stroke modes of access.

#### Snowmobile Sound / Noise

In an editorial written in the Salt Lake City Tribune on Tuesday, November 16, 1999, it states, "Preserving a national park's pristine and quiet nature by banning snowmobiles is not a revolutionary idea; the park service already does it in Glacier and Yosemite. Given three decades of evidence of the disturbance these machines have caused, there would seem to be even more justification to ban them at Yellowstone. Natural Quiet, "An important part of the mission of the NPS is to preserve or restore the natural soundscapes associated with national parks. The natural soundscapes (also called natural quiet) are unimpaired sounds of nature, and are among the intrinsic elements that combine to form the environment of our natural parks." On the paragraph on Natural Quiet on page 126 of the DEIS, it states, "Natural sounds are slowly and inexorably disappearing."

Parks and wildernesses offer a variety of unique, pristine sounds not found in most urban or suburban environments. They also offer a complete absence of sounds that are found in such environments. Together, these two conditions provide a very special dimension to a park experience... Quiet itself, in the absence of any discernible source, especially man-made, is an important element of the feeling of solitude. Quiet also affords visitors

an opportunity to hear faint or very distant sounds such as animal activity, waterfalls, etc. Such an experience provides an important perspective on the vastness of the environment in which the visitor is located, often beyond the visual boundaries determined by trees, terrain, and the like... In considering natural quiet as a resource, the ability to hear clearly the delicate and quieter intermittent sounds of nature, the ability to experience interludes of extreme quiet for their own sake, and the opportunity to do so for extended periods of time is what natural quiet is all about.

The preceding paragraph is from the conclusion of a 1995 National Park Service report on the effects of Aircraft overflights on the NPS. This report also refers, in section 3.3 of its Conclusion, to five important facts that are to be considered when dealing with natural quiet:

- 1) Natural quiet is a resource for preservation within the NPS mandate.
- 2) The human auditory system is an excellent mechanism for determining the presence or absence of natural quiet. No available electronic device can duplicate human hearing for identifying audible sounds produced by non-natural sources.
- 3) The difficulty of preserving natural quiet is directly related to how quiet it is
- 4) Humans are not always aware of sounds that are audible
- 5) Park settings can provide levels of natural quiet so quiet that there is no sound to be heard except that generated by the listener - the sounds of walking, breathing, heart pumping, and blood flowing.

The NPS Management Policies (chapter 4, page 17) says, "The National Park Service will strive to preserve the natural quiet and the natural sounds associated with the physical and biological resources of the parks (for example the sounds of the wind in the trees or of waves breaking on the shore, the howl of the wolf, or the call of the loon). Activities causing excessive or unnecessary unnatural sounds in and adjacent to parks... will be monitored and action will be taken to prevent or minimize unnatural sounds that adversely affect park resources or values or visitors' enjoyment of them."

Snowmobile use has led to inescapable noise throughout YNP, GTNP and JDRP. The effect of this noise is stress to winter-worn wildlife and, to other visitors, the loss of the stillness, solitude and natural quiet that they came to enjoy.

The Preferred Alternative B falls far short of the mark in attempting to mitigate the problems of noise in both YNP and GTNP and, if implemented, would appear to be in violation of the Park Services' own Management Policies as they apply towards noise. The selection of a 70dB level for sound seems to be quite arbitrary, is not "strict" in any sense of the word, and will not come close to satisfying the NPS Management Policies. The timelines in the preferred alternative are also far too long to adequately address the noise issue. The problem can and should be dealt with in a much more aggressive manner. Two to three years is more than adequate to implement changes. Ten years is far too excessive.

Only the plan outlined in *The Citizens' Solution* to YNP and GTNP Winter Use, with its reliance on mass-transit systems featuring quieter snow coaches, will effectively deal with the noise that has been allowed to spread throughout these parks.

#### Human Health and Safety

Human Health and Safety issues have been discussed above from inhalation of pollutants from two-cycle engine of snowmobiles and the possible infraction of air quality standards. Other issues addressed by the Preferred Alternative B should be addressed in any alternative, especially hours of travel allowed in the Parks. With snowcoach travel only under *The Citizens' Solution*, schedules should be published and adhered to. Daylight only travel would protect wildlife and add to human safety. This would also protect the park resources in enforcement, reservations at lodges and backcountry permits. We agree with most of the Human Health and Safety measures put forth by the Alternatives except for the CDST. *The Citizens' Solution* advocates closure of this trail in GTNP and JDRP. By closing the CDST, auto/snowmobile conflict will be resolved. *The Citizens' Solution* also advocates the closure of the East Entrance. This entrance is used by less than 3% of winter visitor. Because of the possible avalanche conditions and the need to use military explosives for avalanche control, a use not in keeping with the purpose of national parks, the Park Service should close the East Entrance. Finally, wildlife health and safety should be recognized in any alternative. I fully agree that backcountry travel should be limited to established trails and not be allowed into critical winter habitat. The Park Service will need to educate all winter visitors on health and safety issues for humans and wildlife.

#### Social and Economic Impacts

Social and Economic impacts are identified in the DEIS with the help of the cooperating agencies, the counties surrounding the GYA. The Park Service has recognized the impact the Winter Use Plan would have on the surrounding communities but through the Preferred Alternative B, have pleased none of the cooperating agencies. The surrounding counties are proposing a Revised Alternative E that would alleviate any social and economic impact to their communities. The Preferred Alternative would have a major impact on West Yellowstone because of the number of snowmobile concessions and the fact that they advertise themselves as the "Snowmobile Capitol of the World." The Jackson area would also be impacted because of the increased snowmobile traffic that may/will use the South Entrance to enter Yellowstone on a single user motorized vehicle. In the DEIS on page 89, it is estimated that the expenditures generated in the GYA by nonresidents visiting the parks in winter months is \$60 million. With a total annual output of \$12.7 billion in the GYA, the winter economy represents only 0.5%. This is a minor affect to the economy as a whole. It is understood that West Yellowstone's winter economy represent 20% of their annual revenue. They would be able to make up any shortfall with changing to cleaner burning snowcoaches.

*The Citizens' Solution* recognizes the social and economic impact on surrounding communities. With access still viable by snowcoach, the economic impact should be

minor while the snowmobile outfitters either change to snowcoach providers or revamp their businesses to recreation outside of the national parks. This is already happening in West Yellowstone and Jackson through use of the surrounding national forest. However, this can have a negative impact to the surrounding public lands, these public lands users and wildlife. It should be addressed cooperatively and proactively by all the public lands managers in the GYA, not left without adequate planning as has snowmobile and visitor use in YNP, GTNP, and JDRP.

By allowing snowcoach travel into the YNP and the present auto restriction in GTNP, access for visitors are still available and affordable. As criteria for any plan, *The Citizens' Solution* meets those criteria.

#### Natural Resources

Finally, we request that the Park Service determine the winter visitor carrying capacity of the GYA to determine the social and economic impact on the parks in future years.

This winter carrying capacity is also needed to address Natural Resource management of the Parks. Please consider the following in respect to natural resources:

- 1) Protect natural resources for the benefit of all Americans and for future generations
- 2) Continue studies on impact of winter use to natural resources. Protect those natural resources when necessary with selected closure of areas if necessary.
- 3) Restrict non-motorized use in important winter range
- 4) Restrict oversnow motorized travel to snowcoaches that meet stringent air quality standards
- 5) Eliminate motorized use on Jackson Lake
- 6) Allow non-motorized travel only on groomed trails in frontcountry
- 7) Manage winter use to the benefit of wildlife and natural resources
- 8) Establish grounds for cooperating agency status.

In addition to emphasizing snow coach access, *The Citizens' Solution* will:

- 1) Require a study to determine the winter carrying capacity in YNP and GTNP so that the Park Service can strike a better balance between protection of park resources and providing visitors with a quality park experience
- 2) Limit off-trail backcountry use by skiers and snowshoers in places where wildlife need additional protection
- 3) Discontinue the Continental Divide Snowmobile Trail in GTNP
- 4) Close YNP's east entrance road where expensive avalanche control efforts involve military explosives that are not in keeping with the purpose of national parks
- 5) Encourage further research on the needs of wildlife wintering in YNP and GTNP

Thank you for the opportunity to comment on the Winter Use Plan DEIS. Please keep me informed on any plans affecting the GYA.

Sincerely,

*John Spahr*

John Spahr  
1885 E. Limber Pine Road  
Jackson, WY 83001

JOHN SPAHR
Page 1. Statements of support for The Citizens' Solution do not respond directly to information in the DEIS. That alternative most closely resembles alternative G in the DEIS. Support for a course of action goes to the decision to be made – and may be of interest to the decision maker but does not provide rationale that affects the DEIS analysis.
Page 1. All alternatives in the DEIS address the purpose and need for action to some degree. Alternative B addresses safety issues, affordable access, and concerns about impacts on sound and clean air. Criticism of alternative B as the preferred alternative goes to the decision to be made. At this juncture, the criticism is moot because the preferred alternative will change in the FEIS.
Page 1. Criticism of alternative B as the preferred alternative goes to the decision to be made. At this juncture, the criticism is moot because the preferred alternative will change in the FEIS. The effects of alternative B are disclosed in the DEIS, and that alternative or its various features remain as choices for the decision maker.
Page 2. Recreation carrying capacity determination would be performed under any alternative (DEIS page 25).
Page 2. Capacity determination is not mandated. Protection of resources and values for the enjoyment of future generations is the primary mission. Findings must be made regarding the extent, magnitude and duration of adverse impacts relative to the mission. Carrying capacities and subsequent use limitations may be a means to achieve a balance between recreation use and protection of resources. Carrying capacity determination is a highly complex task that will require a great deal of time to accomplish.
Page 2. Support for a course of action goes to the decision to be made – and may be of interest to the decision maker but does not provide rationale that affects the DEIS analysis. Alternative G in the DEIS provides a mass transit oversnow access option for the decision maker.
Page 2. Support for a course of action goes to the decision to be made – and may be of interest to the decision maker but does not provide rationale that affects the DEIS analysis. Alternatives D and E in the DEIS provide options for backcountry nonmotorized use limits in YNP. The preferred alternative in the FEIS will incorporate such features for both park units.
Pages 2-3. Statements of support for The Citizens' Solution do not respond directly to information in the DEIS. That alternative most closely resembles Alternative G in the DEIS. Support for a course of action goes to the decision to be made – and may be of interest to the decision maker but does not provide rationale that affects the DEIS analysis. See matrix that compares features of the Citizens' Solution with alternative features in the DEIS.
Page 3. NPS acknowledges the comment. Additional survey results are available for use in the FEIS. Determinants of winter use, or how various impact topics/effects are weighted, will fall to the decision maker and the rationale for the eventual decision.
Page 3. Our assessment indicates that there will not be a tunnel effect. Berms will be created, but for most of the distance they would not impede the view of scenery. These impacts are discussed on page 219 of the DEIS. Created berms will be laid back to allow wildlife to exit the road, as a provision of all alternatives in which road segments are plowed (DEIS page 25).
Pages 3-4. The purpose and need for action is predicated on NPS mandates, executive orders, regulations and policies, including those that relate to air quality.
Pages 4-5. Re: impacts of snowmobiles on air quality. The DEIS discloses the impacts of snowmobiles on air quality, beginning with the methods and assumptions section on page 164 and subsequently for each alternative. This information is updated in the FEIS using recently completed studies and modeling.
Page 7. The impacts on sound alluded to in this comment have been disclosed in the DEIS. Suggesting what the decision should or shouldn't be, or questioning the justification for designating the preferred alternative, is insufficient rationale for dismissing an alternative from the range to be considered.
Page 9. Recreation carrying capacity determination would be implemented under any alternative (DEIS page 25). Carrying capacity determination is a highly complex task that will require a great deal of time to accomplish.